

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CHANTA LONDON,

Plaintiff,

V.

C.A. NO. 4 _____
(JURY DEMAND)

**ROSCHELL GUMS, a/k/a ROSCHELL
D. WARD, a/k/a ROSCHELL
REAVELEY, d/b/a TDA
INVESTIGATIONS, d/b/a THOMAS,
DIXON, ASSOCIATE
INVESTIGATIONS, d/b/a THOMAS,
DIXON & ASSOCIATES; ANTONIO
THOMAS; FRANK GIBBS, JR.;
FREDERIC THOMAS; ANTHONY
KENNEDY; SHARON DAVIS, d/b/a
SET 'EM FREE BAIL BONDS and
SET 'EM FREE BAIL BONDS, INC.,**

Defendants.

AFFIDAVIT OF CHANTA LONDON

STATE OF TEXAS

COUNTY OF FORT BEND

www

KNOW ALL MEN BY THESE PRESENTS:

BEFORE ME, the undersigned authority, on this day personally appeared Chanta London, known to me to be that person whose name is subscribed to this

Affidavit and who, after being duly sworn on his oath, testified and stated the following:

1. "My name is Chanta London. I am over the age of eighteen (18) years old, of sound mind, fully competent and duly authorized to make this affidavit. The statements contain herein are based upon my personal knowledge and they are true and correct."
2. "In the fall of 2011, my husband was arrested in the City of Houston. At the time he was arrested, I did not have the money to meet the bond which was set at \$20,000.00. Sometime in December of 2011, I was able to afford the down-payment for the \$2,000.00 necessary to obtain the \$20,000.00 bond. I went to Set 'Em Free Bail Bonds to obtain that bond. They told me to make a \$750.00 down-payment and once my husband was released from jail, to make a payment every week of \$50.00 to \$100.00 until the \$2,000.00 was paid in full. Either my husband or I made the payments every week for about three (3) months. I believed that as of June of 2012, the bonding company had been paid in full. My husband appeared for his required court appearance and satisfied the obligation of the bond by doing so."

3. "In August of 2012, I began receiving calls at my workplace from representatives of Set 'Em Free Bail Bonds. They told me that the money paid had not paid the bond in full, because there had been late fees and other penalties added to the original amount due. They told me that if I did not pay the amount due immediately, they would have me arrested. I told the bail bonds representative that I could pay no more than \$20.00 to \$30.00 each month because my husband was not working and I had three children in college and an 11 year old daughter I am supporting at home. I also asked the bail bonds representative to provide me with proof of the amount that they claimed I still owed, because I believed that the full amount had been paid off. I told the representative to please not call me at my workplace anymore, because I was not allowed to get personal calls at work and could get fired if I received too many of them. A short while later, I received another call from the representatives at Set 'Em Free Bail Bonds telling me once again that if I did not pay the amount in full that I would be arrested. Set 'Em Free Bail Bonds did stop calling my workplace at that time and continued calling me on my cell phone. I did not get any further calls at my workplace until September of 2012."

4. "On September 19, 2012, I received a call from my aunt, Diane Mitchell, telling me that she had just received a telephone call from someone saying that I might be going to jail if I did not pay my bail bond. I told my aunt that I was not in trouble and had not been arrested. Since I was at work at the time, I excused myself from work immediately and went outside in order to talk on my personal cell phone. By the time I got outside, I had a telephone call from my mother telling me that someone had called her telling her that if I did not pay for my bail bond immediately, I would be arrested on a warrant and go to jail. When I got off the phone with my mother, I saw that I had missed a call and I checked my voice mail to find that the call was from a person representing themselves as an investigator at TDA Investigations. The voice mail stated that if I did not pay the remaining amount due to Set 'Em Free Bail Bonds, I would have a warrant issued for my arrest and I would go to jail. Immediately after hearing that voice mail I got a telephone call from my 84 year old grandmother who told me that a man had called her and told her that I was in trouble with the law and could be going to jail. I immediately called the phone number left on my voice mail by TDA Investigations and spoke with representatives there. I told them that I could not receive calls like that at my workplace

and that I would get fired if I did. The person at TDA Investigations told me that they were not subject to the debt collection laws like the federal Fair Debt Collection Practices Act and could continue calling my friends, family, and my workplace and could even discuss the nature of the debt and the circumstances of the bail bonds with them. I have tapes of those telephone conversations and the tapes are the best evidence of exactly what was said on the phone conversations.”

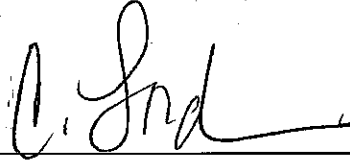
5. “When I got back to my desk after all of these telephone calls, I was scared to death that I would be arrested. Since my husband’s probation has been revoked, I am caring for my 11 year old daughter and supporting my three children in college on my own. If I were arrested, I do not know what would become of me and my children. I was also scared that TDA Investigations would continue to call my workplace. I work at a telephone call center and if I am on another line, my phone rolls to other telephone representatives. In addition, all of the calls are taped and monitored at the call center. If I were to be caught having a personal telephone call from this bail bonds debt collector, I could be terminated from my position. The nature of the call would also tarnish my reputation in my job with my co-workers and my supervisors. The calls to my friends and family are

tarnishing my reputation with my own family. I have never been arrested or in trouble with the law. If these calls continue, there will be no way for me to explain away or make up the loss of reputation.”

6. “I tried consulting with various attorneys to find out if I could actually be arrested for not paying some amount due on a bail bond. I could not get an answer and was scared that I would be arrested on some type of a warrant.
7. On October 3, 2012, I received another phone call at work from an investigator at TDA Investigations who told me essentially the same thing: that if I did not pay this debt immediately, a warrant would be issued for my arrest for not paying the debt. I told her again that I was subject to being fired for getting calls like this at my workplace. I finally obtained Mr. Probus’s name as an attorney who could possibly help me with the situation and I retained him to try to get these calls to stop.
8. The representatives at TDA Investigations have told me that they will not stop calling my workplace and they continue to do so. They have also told me that they can continue calling my friends and family members and talk to them about the bail bond for my husband and the debt that they claim I owe for that bail bond. This will do terrible damage to my personal reputation with my friends and family members. There is no amount of

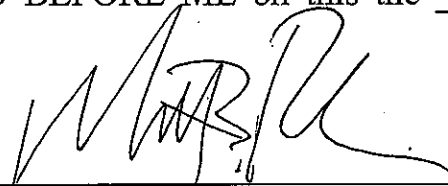
money that could compensate me for the way my mother, aunt, and grandmother view me in their eyes.”

FURTHER AFFIANT SAYETH NOT.



Chanta London

SUBSCRIBED AND SWORN TO BEFORE ME on this the 8th day of October, 2012.



Notary Public in and for
the State of TEXAS

